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Hearing date: 6/26/14 at 10:00a.m.EST
Objection Deadline: 6/19/14 at 4:00p.m. EST

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:) Case No.: 12-12020 (MG)
)
RESIDENTIAL CAPITAL, LLC, et al.) Chapter 11
)
Debtors.) Jointly Administered
)
)

CLAIMANT BARRY MACK'S OBJECTION TO RESCAP BORROWER CLAIMS
TRUST'S MOTION FOR ORDER ESTIMATING CLAIMS AND ESTABLISHING
DISPUTED CLAIMS RESERVE

**TO THE HONORABLE MARTIN GLENN
UNITED STATES BANKRUPTCY JUDGE:**

Claimant, BARRY MACK, hereby submits this Objection to Rescap Borrower Claims Trust's Motion for Order Estimating Claims and Establishing Disputed Claims Reserve, and state as follows:

1. The Trust is seeking to establish a Disputed Claims Reserve in the amount of \$8,640,000 (Motion, ¶ 4).

2. In support of its Motion, the Trust alleges that the disputed claims, "should not be allowed and in many if not all cases are inflated to an astonishing degree..." (Motion, ¶ 3) and requests the Court estimate the actual amounts of the claims at the amount of \$60,000 per claim for the five largest claims (Motion, ¶ 24).

3. There are 597 Borrower Claims that have not been resolved, and the actual value of the claims is \$826,021,135 (Talarico Decl., ¶8).

4. The Borrower Claimants would be prejudiced if the Trust were permitted to establish a disputed claims reserve in the amount of \$8,640,000, as such an amount is slightly over 10% of the actual value of the claims and therefore may not be sufficient to cover the remaining 597 Borrower Claims.

WHEREFORE, Claimant, BARRY MACK, prays that the Motion be denied, and each claim be considered on its merits and that sufficient funds to cover all claims be maintained in a Disputed Claims Reserve until the 597 claims are disposed of.

DATED this 19th day of June, 2014.

/s/ David F. Garber

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